

Message

From: Maria Powell (MEJO) [mariapowell@mejo.us]
Sent: 6/26/2017 4:30:01 PM
To: Ramanauskas, Peter [ramanauskas.peter@epa.gov]
Subject: Re: Follow up, Re: question about PCB remediation/closure

Thanks Peter. I appreciate it.

However, I see little point to calling Becky. She has zero respect for me. She has ignored and ridiculed my and many other neighbors' concerns for years about how contamination on the Goodman property is addressed (or not), and will likely do so again in this case.

In one example of many, for instance, Goodman Center was found to be violating most components of the DNR-required cap maintenance plan when they excavated the cap to build their outdoor patio in 2012. Goodman didn't notify DNR of the excavations, they didn't do the required sampling beforehand, nobody knows where the untested excavated soils went, etc. We notified Mike Schmoller, who confirmed that they had in fact not followed the legal requirements, but that it was OK because the contractors knew what they were doing. During the excavations, children were playing feet away, food from the food pantry was sitting next to it, dust was flying everywhere.

As they have many times before, with little or no data to back it up, DNR (Schmoller) will assure Becky that everything is fine--there are no public or environmental risks-- and I and other neighbors are alarmist and should be ignored. We have been through this countless times and there is no point humiliating ourselves yet again by going that route.

Thanks anyway, though. We will find another approach.

Maria

On 6/23/2017 3:44 PM, Ramanauskas, Peter wrote:

Hello Maria,

Just wanted to follow up and let you know that I did reach out to Becky Steinhoff, Executive Director of the Center at becky@goodmancenter.org or 204-8025, to make her aware of your concerns. She indicated she would be happy to speak with you about your questions & concerns.

Regards,
Peter

From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]
Sent: Monday, June 19, 2017 8:48 AM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Re: Follow up, Re: question about PCB remediation/closure

Hi Peter,

No worries about the delayed response. I know everyone is busy.

Thanks for the guidance and offer to contact the center to make them aware of this guidance. Many people in the neighborhood are very concerned about this renovation, not just me.

However, again, I and other citizens are not primarily concerned about PCBs in building materials per se (though that may be an issue); we are concerned that PCBs were used at the Brassworks in metal processing there, but not enough testing was done to ascertain that.

Brassworks is very close (less than 100 feet?) to the highly contaminated northern end of the Kipp building built in 1902. Storm and sewer drains serving Kipp, Brassworks, Kupfer Ironworks (now the Goodman Community Center) are all connected. Historically these companies stored materials and wastes on adjacent sites when they didn't have space on their own. One of the storm drains from Brassworks goes (or formerly went, it's hard to tell from maps) to the ditch area along the bike path at Kipp's northern boundary where PCBs were found at very high levels last year (over 500 ppm).

Unfortunately, neither DNR nor the city have developed conceptual site models or taken a comprehensive approach in looking at contaminant pathways, fate and transport at these sites, despite NR 700 rules that appear to require this. This is one reason why PCBs and other contaminants continue to be unexpectedly "discovered" in places government agencies said there wouldn't be any.

Thanks,
Maria

On 6/16/2017 4:02 PM, Ramanauskas, Peter wrote:

Hello Maria,

Sorry it has taken me a bit to get back to you. Have been on some travel as of late.

As to your question about the building, EPA has released guidance on precautionary measures and best work practices for conducting repairs or renovations in older buildings which have the potential to contain PCB, mainly in non-liquid building materials which may be present in structures of a certain age. That guidance can be found here <https://www.epa.gov/pcbs/steps-safe-renovation-and-repair-activities>

I will be happy to contact the Center to make them aware of this guidance and inform them of your concern with respect to the Brassworks building renovation.

Regards,

Peter

From: Maria Powell (MEJO) [mailto:mariapowell@mejo.us]
Sent: Thursday, June 08, 2017 1:49 PM
To: Ramanauskas, Peter <ramanauskas.peter@epa.gov>
Subject: Re: Follow up, Re: question about PCB remediation/closure

Peter:

Mike's response is very familiar. In February 2012, we and some of our community collaborators asked Mike Schmoller why they hadn't tested for PCBs at Kipp and suggested that they do so (as citizens had since the 90s). He told us, in no uncertain terms, that he had no reason to believe there would be PCBs there. Of course, one month later (March 2012), significant levels of PCBs were found there when they were digging to build the SVE system. You know the rest of the story.

So, we are skeptical of DNR's claims that there are no contaminants inside the Brassworks building when there has been no testing. There was some testing of soils there, and significant levels of PAHs and metals were found (see attached, beginning pg. 12). PCBs (7 aroclors) were tested in 3 locations and all were under detection limits. This seems like far too few samples to rule out PCBs.

The soils will be removed/remediated, but what about the building? Given that the Brassworks building will be used for programs for children run by the Goodman Center, it seems imperative that building materials be tested.

Can you suggest any way that citizens could request that this testing be done, other than asking the DNR (which will say no)?

Thanks,
 Maria

On 6/8/2017 8:01 AM, Maria Powell (MEJO) wrote:

Thanks, Mike.

As you know, brass and other metal foundries commonly involved the use of PCBs.

Anyway, I will assume (unless you say otherwise) that no other contaminants were tested inside the building either (metals, etc) before the art show and public open houses in coming days.
http://host.madison.com/ws/news/local/forged-exhibit-to-meld-art-and-madison-history/article_c72d0acd-85ef-553c-8652-f5f894a9ce00.html

As far as I know, there has been no remediation yet in the building. I hope the artists didn't pound into contaminated materials as they set up their exhibits.

Maria

On 6/7/2017 12:30 PM, Schmoller, Michael R - DNR wrote:

Maria

I do not believe there was interior sampling for PCBs at the Brassworks site. I do not think there was anything in the site history that suggested that PCBs would be present inside the building.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

R. Michael Schmoller

Phone: 608-275-3303

Michael.schmoller@wisconsin.gov

From: Maria Powell (MEJO)
[mailto:mariapowell@mejo.us]
Sent: Tuesday, June 06, 2017 2:18 PM
To: Ramanauskas, Peter
Cc: Schmoller, Michael R - DNR
Subject: Follow up, Re: question about PCB remediation/closure

Hello again,

Just a reminder--Mike, I'm hoping you can address my questions below.

Expanding a bit on the 2nd question--can you tell me if any contaminant testing (PCBs or anything else) was done on materials inside the Brassworks building? Right now artists are in there working on

sculptures and other art for a public open house this weekend.

Thank you,
Maria

On 5/30/2017 8:40 AM, Maria Powell (MEJO)
wrote:

Peter--

Thanks--this is helpful.

A few years ago I copied everything in the Goodman file, including the 2005 documents. I didn't see any maps or data on the Goodman PCB soil sampling. **Mike, did I miss it--and if so, can you share it?**

Thank you for informing the Goodman leaders about proper management of the PCB contaminated materials. On a related note--**Mike, will Goodman be expected to test for PCBs in materials in the Brassworks building that they will be refurbishing soon for their center expansion?**

Thanks, I appreciate the responses.

Maria

On 5/26/2017 3:38 PM,
Ramanauskas, Peter wrote:

Hello Maria,

For old industrial properties, sometimes there is little information available on what PCB sources might have been. Section 2.1.5 of the October 2008 Closure Request that you sent me references the September 2005

PCB soil sampling
requested by WDNR
and indicates
there was an
August 2005
report and a
September 2005
report attachment
submitted. Do you
have copies of
those? If not,
please request
the information
from Mike
Schmoller with
WDNR (cc'd here)
as I imagine
those documents
would contain the
information on
the soil sampling
that you are
interested in,
including
information about
suspected PCB
sources.

As to your
question about
responsibility
for proper
management of
PCBs should they
perform
reconstruction/re
novation that may
affect residually
impacted areas,
the Goodman
Center as the
property owner is
responsible for
proper management
of regulated PCB.
To that end, we
will contact the
Goodman Center to
inform them of
such
responsibility.

Thanks,
Peter

-----Original
Message-----
From: Maria
Powell (MEJO)
[\[mailto:mariapowell@mejo.us\]](mailto:mariapowell@mejo.us)

Sent: Thursday,
May 25, 2017 9:26
AM
To: Ramanauskas,
Peter
<ramanauskas.pete
r@epa.gov>
Subject: Re:
question about
PCB
remediation/closu
re

Peter,

Thank you.

Yes, I know they
tested four soil
samples for PCBs.
As I said below,
there are no maps
of where they
took these four
samples and this
soil PCB data is
not in the files.
So we know
nothing about
where they
tested, what they
tested, what the
detection limits
were, etc. There
is nothing in any
of the reports
suggesting that
they identified
what the sources
of PCBs were,
where they were,
etc.

How can you
appropriately
assess and
remediate a site
without knowing
the source of the
contaminants and
how they were
used, pathways of
release, etc? I
believe
Wisconsin's NR
700 rules require
some of this, but
these rules are
rampantly ignored
at sites in south
central
Wisconsin.
Consequently, we

have situations
like Madison
Kipp--where the
PCBs were
"discovered" in
2012, after
citizens raised
questions about
them for decades
but DNR said they
weren't there
because they
never tested for
them. Goodman, of
course, has
children playing
all over it, so
the stakes are
even higher.

One further
question: What
entity is
responsible to
assure that when
Goodman does
reconstruction
inside the
building, they
handle the PCBs
appropriately?
The DNR? Goodman?
The contractors?

Thanks,
Maria

On 5/24/2017 2:24
PM, Ramanauskas,
Peter wrote:

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Although the owner considered the federal PCB clean up regulations in the actions they took to address the contamination found in the building materials that exceeded 1 mg/kg,
, because the as-found concentrations of PCB did not exceed 50 mg/kg,
, they may not have notified

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(MEJO
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[\[mail
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Sent:
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Subject: Re: question about PCB remediation / closure

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